

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**DOCKET NO. 2021-143-E**  
**DOCKET NO. 2021-144-E**

Application of Duke Energy Progress,	)	
LLC for Approval of Smart Saver Solar	)	
as Energy Efficiency Program	)	
	)	<b>PETITION TO INTERVENE</b>
Application of Duke Energy Carolinas,	)	
LLC for Approval of Smart Saver Solar	)	
as Energy Efficiency Program	)	

The South Carolina Coastal Conservation League (“CCL”), Southern Alliance for Clean Energy (“SACE”), North Carolina Sustainable Energy Association (“NCSEA”), and Upstate Forever (collectively, “Petitioners”) respectfully petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned dockets pursuant to R.103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. On April 23, 2021, Duke Energy Carolinas, LLC’s (“DEC”) and Duke Energy Progress, LLC’s (“DEP”) (collectively, “Duke Energy” or “the Companies”) filed an application with the Commission for approval of the Smart Saver Solar Energy Efficiency Program (the “Program”) to be included in the Companies’ suite of energy efficiency and demand side management programs.

2. The Program is designed to reduce energy consumption by incentivizing the installation of rooftop solar at residential households. Specifically, the Program gives Duke Energy customers the option to earn an upfront incentive for installing rooftop solar if they also enroll in the winter-focused Power Manager Load Control Service Rider,

known as Bring Your Own Thermostat (“Winter BYOT Program”). The Winter BYOT Program provides for winter-focused demand response and was previously approved in Order No. 2020-830.

3. The Program is the result of the same collaboration between the Companies and Petitioners that produced the Duke Energy solar choice tariff recently approved by the Commission in Docket Nos. 2020-264-E and 2020-265-E.

4. CCL is a nonprofit corporation organized under the laws of the State of South Carolina whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in its communities by working with individuals, businesses, and government to ensure balanced solutions. CCL and its members support the development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from Duke Energy and who will be directly impacted by the net metering and energy efficiency policies at issue in this proceeding. Commission approval of the Program will provide those members with an opportunity to reduce their energy consumption and utility bills. The principal address of CCL is 131 Spring Street, Charleston, South Carolina 29403.

5. SACE is a nonprofit organization whose mission is to promote responsible and equitable energy choices to ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South’s energy needs. SACE has members in South Carolina who receive electricity service from Duke Energy and who will be directly impacted by the net metering and energy efficiency policies at issue in this proceeding.

Commission approval of the Program will provide those members with an opportunity to reduce their energy consumption and utility bills. SACE's principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Georgia and North Carolina, and in-state staff in Florida and South Carolina.

6. Upstate Forever is a non-profit, membership-based organization existing under the laws of the State of South Carolina. Upstate Forever promotes sensible growth and the protection of the critical lands, waters, and unique character of Upstate South Carolina. Upstate Forever has members in South Carolina who receive electricity service from Duke Energy and who will be directly impacted by the net metering and energy efficiency policies at issue in this proceeding. Commission approval of the Program will provide those members with an opportunity to reduce their energy consumption and utility bills. The principal address of Upstate Forever is 507 Pettigru Street, Greenville, South Carolina, 29601.

7. NCSEA is a non-profit corporation formed under the laws of North Carolina, with individual, business, and government members located and doing business in both North Carolina and South Carolina. NCSEA's mission is to promote a sustainable future through the use of renewable energy and energy efficiency programs. NCSEA seeks to achieve its objectives by advocating for public policies that encourage the responsible technological and market development of renewable energy and energy efficiency, including all aspects of demand side management, a smart grid, energy storage, and vehicle electrification. NCSEA members include businesses that sell, install, and lease customer-sited solar generation and whose business will be directly impacted if

more customers are incentivized under the Program to install rooftop solar. NCSEA's principal address is 4800 Six Forks Road Suite 200, Raleigh, North Carolina 27609.

8. Petitioners intervened and were active participants in recent net metering dockets affecting the Duke Energy service territory, including Docket Nos. 2019-182-E, 2020-264-E, and 2020-265-E.

9. In this proceeding, Petitioners will advocate in support of Duke Energy's application to provide customers with improved access to rooftop solar and additional ways to reduce their energy consumption. More generally, petitioners seek to promote innovative tariffs, as well as energy efficiency and demand side management programs, that reduce reliance on fossil fuels and support the expansion of renewable energy in South Carolina. Petitioners' involvement in this docket supports clean energy decisions that will lead to cleaner, safer, and healthier communities for all South Carolinians.

10. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Petitioners are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 7 day of July, 2021.

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and Upstate Forever*

# CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the *Petition to Intervene* of the South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, North Carolina Sustainable Energy Association and Upstate Forever.

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This 7<sup>th</sup> day of July, 2021.

S/Kate Lee Mixson